

Jasco Products Company Comments on ENERGY STAR Program Requirements for Residential Light Fixtures Draft 1 Eligibility Criteria – Version 4.0

Thank you for your efforts to improve the Energy Star criteria requirements.

I have the following input:

- A new requirement has been added that ballasts used in fixtures must be replaceable without destruction to the fixture or surrounding carpentry.

I am opposed to this requirement for the following reasons:

- 1) This will drive up the cost of the product manufacturing cost and the end user cost. This would put Energy Star qualified products at a disadvantage in price to non-Energy Star products. This is a burden that is not necessary. If the end user wants this capability, he will make the “market” and manufactures will then meet their desire and need.
- 2) A readily available and cost effective source for replacement ballasts would need to be available for the consumer for them to take advantage of this repair option.
- 3) Labor cost of a skilled electrician to perform this function would not be cost effective.
- 4) New liability risks would now be assumed by the manufacture/distributor.
- 5) Any product literature on how to perform this task will be long gone before an electrician would need to perform this task. It is not realistic to think it will be available at the time for repair.

Effective Date

Since Energy Star is new to Jasco, I am concerned about the cost and having less than one year(Oct 1, 2005 proposed effective manufacture date) to requal all of our GE brand products to these new standards. If some of the products cannot meet the new standard, we will be burdened with the cost of re-design of the product or the cost of new packaging artwork.

If I have additional issues in the document after further review and consideration, I will document them for you prior to your deadline.

Regards,
Mark Simpson
Jasco Products Company